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Illinois Environmental Protection Agency

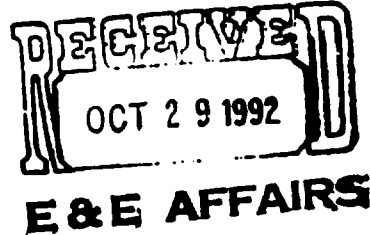
P. O. Box 19276, Springfield, IL 62794-9276

217/785-8604

October 27, 1992

Cerro Copper Products
Post Office Box 66800
St. Louis, Missouri 63166-6800

Re: 1631210008 -- St. Clair County
Sauget/Cerro Copper Landfill
Compliance File



Gentlemen:

On September 25, 1992, an inspection of your facility was conducted by field personnel representing the Illinois Environmental Protection Agency. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the Illinois Environmental Protection Act. The purpose of this inspection was to determine your facility's compliance with the Illinois Environmental Protection Act and 35 Illinois Administrative Code, Subtitle G, Section 814.501(b).

At the time of the inspection, your facility was found to be closed and no waste was being accepted. The Agency will conduct further inspections to determine compliance with your facility's closure plan.

Enclosed is a copy of the inspection report. Should you have further questions, please contact Ken Mensing at 618/346-5120.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Savage".

Glenn Savage, Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:JEH:rlc/2680r/2682r

Attachment



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

County ST. CLAIR Site Code 1631710008
Facility SALFET / CERRO COPPER Region 6 Date SEPT. 25, 1992
Time: From 10:30 A To 11:45 A Photos Taken: Yes (5) No ()
Site Open: Yes () No (✓) Inspector(s) KEN MENSING
Samples Taken: Yes (#) No (✓) Groundwater (#) Surface (#) Other (#)
Interviewed JOE GRANA Weather ~66° DRY Facility Phone No. 618 337-6000
JOE BURROUGHS

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()	Sanitary Landfill ()	EPA OP Permit No. <u> </u>
Temporarily Closed ()	Special Waste Landfill ()	EPA DE Permit No. <u> </u>
Closed not Covered ()	Quantity Received Daily	Other <u>2(d) PERMIT EXEMPT</u>
Closed and Covered (<u>✓</u>)	(1-6) <u>0</u>	None <u> </u>

SITE OBSERVATION

Failure to comply with the terms and conditions of permit(s)
(Section 807.302 of the Regulations) 1.
Failure to deposit refuse in the toe of the fill or into the bottom of the
trench (Section 807.303(a) of the Regulations) 2.
Inadequate spreading and compacting (Section 807.303(b) of the Regulations) 3.
Failure to maintain the proper ratio of the slope of the working face
(Section 807.303(c) of the Regulations)..... 4.
Insufficient operable equipment (); personnel (); supervision ()
available to comply with the permit, the Act or the Regulations
(Section 807.304 of the Regulations) 5.
Uncovered refuse remaining from any previous operating day or at the
conclusion of any operating day (Section 21(o)(5) of the Act) 6. *
Inadequate depth of daily cover (Section 807.305(a) of the Regulations) ... 7.
Inadequate depth of intermediate cover
(Section 807.305(b) of the Regulations) 8.

RECEIVED

- 2 OCT 1992

IEPA/DLPC

- Inadequate depth of final cover (Section 807.305(c) of the Regulations) ... 9. _____
- Failure to provide final cover within time limits established by Board Regulations
(Section 21(o)(6) of the Act and Section 807.305(c) of the Regulations) ... 10.* _____
- Failure to collect and contain litter from the site by the end of each operating day
(Section 21(o)(12) of the Act and Section 807.306 of the Regulations) 11.* _____
- Causing or allowing salvaging: in an unsanitary manner (); in an area not remote from the operating face (); which interferes with or otherwise delays the operation of the landfill (); without removing salvaged materials daily or separating such materials by type and storage so as to create a nuisance, vector harborage or unsightly appearance () (Section 807.307 of the Regulations) 12. _____
- Causing or allowing scavenging operations
(Section 21(o)(8) of the Act and Section 807.308 of the Regulations) 13.* _____
- Causing or allowing feeding of farm or domestic animals upon the site of the sanitary landfill or with refuse delivered thereto
(Section 807.309 of the Regulations) 14. _____
- Improper deposit, acceptance or handling of burning material at a sanitary landfill site (Section 807.310(a) of the Regulations) 15. _____
- Acceptance of wastes without necessary permits
(Section 21(o)(7) of the Act and Section 807.310(b) of the Regulations) ... 16.* _____
- Open burning of refuse in violation of: Section 9 of the Act ();
Section 807.311 of the Regulations () (Section 21(o)(4) of the Act) 17.* _____
- Causing or allowing the operation of a sanitary landfill so as to cause or threaten or allow the emission of contaminants so as to cause or tend to cause air pollution in Illinois
(Section 9(a) of the Act and Section 807.312 of the Regulations) 18. _____
- Causing or allowing the operation of a sanitary landfill so as to cause or threaten or allow the discharge of any contaminants so as to cause water pollution in Illinois
(Section 12(a) of the Act and Section 807.313 of the Regulations) 19. _____
- Conducting a sanitary landfill operation in a manner which results in leachate flow entering Waters of the State (Section 21(o)(2) of the Act and Sections 807.313 and 807.314(e) of the Regulations) 20.* _____
- Conducting a sanitary landfill operation in a manner which results in leachate flows exiting the landfill confines (Section 21(o)(3) of the Act and Sections 807.313 and 807.314(e) of the Regulations) 21.* _____

Inadequate: <u>shelter</u> (); <u>sanitary facilities</u> (); <u>emergency communi-</u> <u>cations</u> () for employees (Section 807.314(a) of the Regulations)	22.	_____
Inadequate roads within the site (Section 807.314(b) of the Regulations) ..	23.	_____
Inadequate control of access to site (Section 807.314(c) of the Regulations)	24.	_____
Inadequate measures for fire protection (Section 807.314(d) of the Regulations)	25.	_____
Inadequate measures to monitor and control leachate (Section 807.314(e) of the Regulations)	26.	_____
Inadequate measures to control: <u>dust</u> (); <u>vectors</u> () (Section 807.314(f) of the Regulations)	27.	_____
Failure to have an operational safety program approved by the Agency (Section 807.314(g) of the Regulations)	28.	_____
Inadequate provision for concealing sanitary landfill operations from public view (Section 807.314(h) of the Regulations)	29.	_____
Causing or allowing development or operation of a sanitary landfill with- out having proven to the Agency's satisfaction that no damage or hazard will result to Waters of the State (Section 807.315 of the Regulations) ...	30.	_____
Failure to <u>monitor</u> : gas (); water (); settling () after the site is completed or <u>closed</u> (Section 807.318(a) of the Regulations)	31.	_____
Failure to take necessary <u>remedial action</u> to abate any gas (); water (); settling () problems after the site is completed or closed (Section 807.318(b) of the Regulations)	32.	_____
Failure to properly file a detailed description of the site upon completion or closure of the site (Section 807.318(c) of the Regulations)	33.	_____
Refuse in standing or flowing water (Section 21(o)(1) of the Act)	34.*	_____
Deposition of refuse in any unpermitted portion of the landfill (Section 21(o)(9) of the Act)	35.*	_____
Acceptance of special waste without a required manifest (Section 21(o)(10) of the Act)	36.*	_____
Failure to submit reports required by permits or Board Regulations (Section 21(o)(11) of the Act)	37.*	_____
Acceptance of special waste for disposal, storage or treatment from a waste hauler that does not have a valid special waste hauling permit (Section 809.302(a) of the Regulations)	38.	_____

Acceptance of special waste for disposal, storage or treatment from a waste hauler that did not present a signed manifest which designated the receiver's facility as a destination for the special waste (Section 809.302(a) of the Regulations) 39. _____

Failure to have financial assurance documents (Section 807.601 of the Regulations) 40. _____

Failure to file: a closure plan (); post-closure plan () (Sections 807.503 and 807.523 of the Regulations) 41. _____

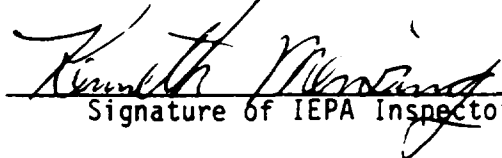
Failure to properly carry-out: closure plan (); post-closure plan () (Sections 807.506 and 807.524 of the Regulations) 42. _____

Apparent violation of: PCB (); Circuit Court () Case Number _____, Order entered on _____, 19 ____ 43. _____

Other 44. _____

INFORMATIONAL NOTES

1. References to "Act" herein refer to the Illinois Environmental Protection Act: Ill. Rev. Stat. ch. 111 1/2, par. 1001, et seq.
2. References to "Regulations" herein refer to the rules and regulations of the Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusion of the Agency or as limiting the Agency's statutory or regulatory powers.
- *. Subject to enforcement either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.



 Signature of IEPA Inspector(s)

GDS:jsm:3/2/11(Rev.1/27/92)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

NARRATIVE EVALUATION DOCUMENT

Date of Review: SEPT. 25, 1997 Reviewer: KEN MEN'SINK
Site Code: 1631710008 County: ST. CLAIR
Site Name: SAUGET / CERRO COPPER Time: 10:30-11:45 A.M.

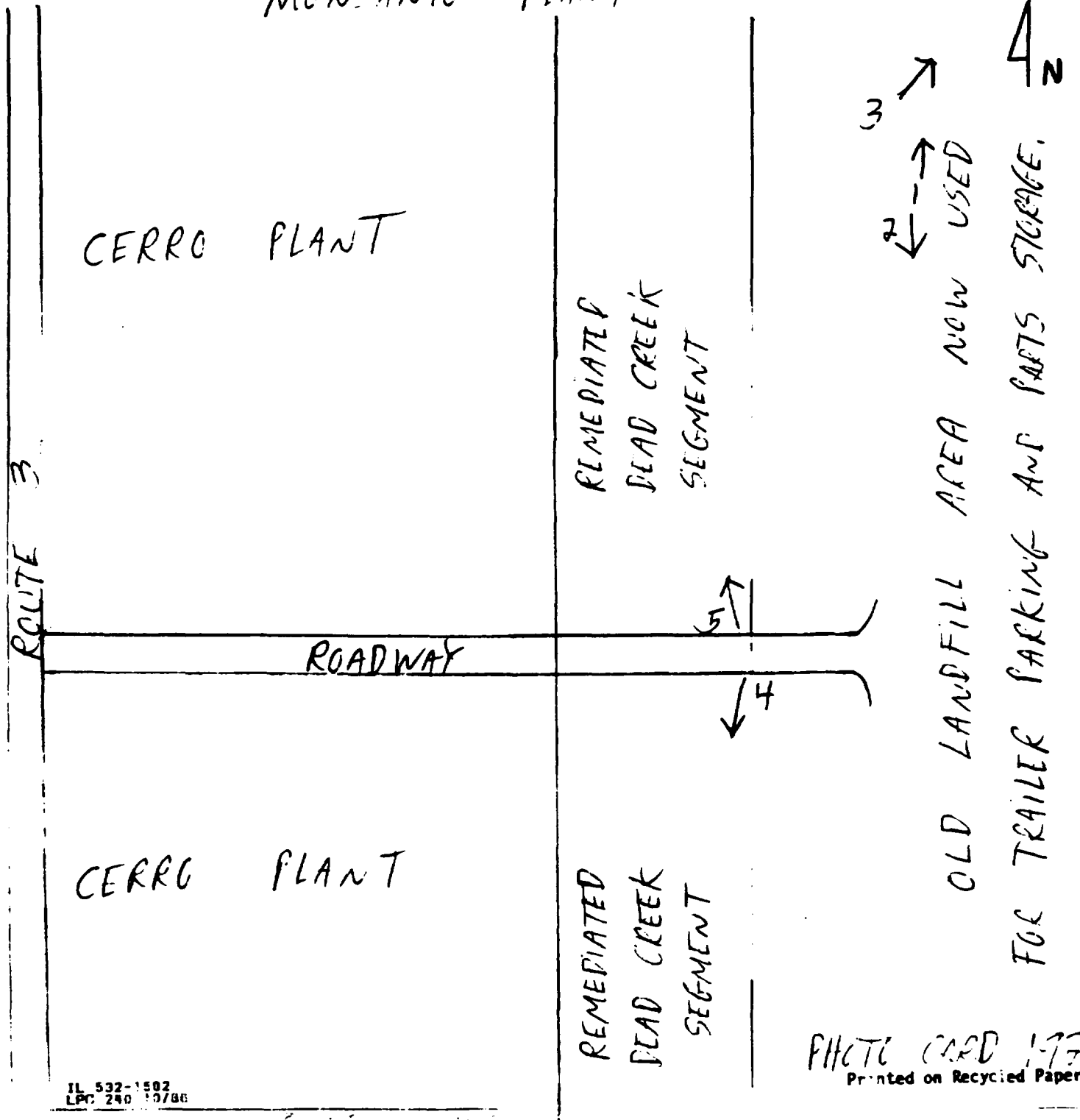
GENERAL REMARKS

THIS INSPECTION WAS CONDUCTED FOR THE PURPOSE OF DETERMINING THE OPERATIONAL STATUS OF THE LANDFILL SITE. CERRO COPPER HAD FILED A PA-15 FOR-1 INDICATING THAT IT WOULD BE INITIATING CLOSURE BY SEPT. 15, 1997. THIS LANDFILL SITE IS AN ON-SITE PERMIT EXEMPT INERT WASTE FACILITY. CERRO DISCONTINUED ITS USE ON MARCH 1, 1991. NO FURTHER WASTE IS BEING DISPOSED OF. THE SURFACE OF THE FILLED AREA HAS BEEN ROCKED AND SERVES AS A TRAILER PARKING AND MATERIAL STORAGE AREA. INITIAL FILLING COMMENCED DURING 1953. THE AREA COMPRISES \approx 17 ACRES. THE SITE IS FENCED TO PRECLUDE ANY UNAUTHORIZED ACTIVITY. ON SEPT. 22, 97 CERRO SUBMITTED AN INITIAL FACILITY REPORT FOR ON-SITE FACILITIES ALONG WITH A SUMMARY OF CERRO'S ON-SITE INERT LANDFILL FACILITY.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: SEPT. 25, 1992 Inspector: KEN MEASINK
Site Code: 1631210008 County: ST. CLAIR
Site Name: SAUGET / CERRO COPPER Time: 10:30-11:45 A.M.
MUNSAUTO PLANT





CERRO COPPER PRODUCTS CO.

P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

September 22, 1992

Illinois Environmental Protection Agency
Bureau of Land
Environmental Information Support Unit
P.O. Box 19276
Springfield, Illinois 67294-9276

Re: Initial Facility Report - On-Site Inert Landfill
Cerro Copper Products Co.
Sauget, Illinois
I.D. # 1631210008 - St. Clair County

Dear Madam or Sir:

This letter is written in response to your September 16, 1992 letter and phone conversations on September 17 & 18, 1992 with Mr. D. Van Nattan concerning Cerro's old On-site Landfill. Cerro discontinued use of its permit exempt inert landfill prior to March 1, 1991. We understood from Mr. Van Nattan that Cerro is only required to submit an Initial Facility Report to conclude its obligation under the applicable regulations.

Attached are the Initial Facility Report and a general summary of the history of the site, and its current status.

We request that the Agency provide a written notice confirming that closure is complete. If you should have any questions or there are any other requirements with which Cerro must comply, please do not hesitate to phone or write this office.

Very truly yours,

CERRO COPPER PRODUCTS CO

A handwritten signature in dark ink, appearing to read "Joseph M. Grana", is written over the typed name.

Joseph M. Grana
Manager of Environmental
and Energy Affairs



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

INITIAL FACILITY REPORT - FOR ON-SITE FACILITIES

35 Illinois Administrative Code Section 815

1631210008
CERRO COPPER PRODUCTS CO.
ILLINOIS RT. 3 @ A&S RAILROAD TRACKS
SAUGET, ILL. 62201

All landfills exempt from permits pursuant to Section 21(d) of the Environmental Protection Act and which received waste after September 18, 1990 are required to submit an Initial Facility Report to the Illinois Environmental Protection Agency. It must be filed with the IEPA by September 18, 1992. New facilities must submit this report before any waste is accepted.

The below information is required by 35 IAC Section 815 to be submitted to IEPA. If you are initiating closure prior to September 18, 1992, the information required to be submitted need only demonstrate compliance with 35 Ill. Adm. Code Section 814.502. If you have any questions, please contact the Permit Section's, Solid Waste Unit at 217/524-3300.

A. WASTE VOLUME SUMMARY

1. Total amount of solid waste disposed on-site to date: unknown (in place cubic yards)
If there is more than one type of waste, please attach a summary of waste types and their amounts. (See attached description)
2. Current yearly rate of disposal: 0 (none)
(in place cubic yards)
3. Remaining capacity in existing units at the facility: 0 (none) (in place cubic yards)

B. PROPOSED ACTIVITIES

1. Expected amount of waste to be disposed on-site October 1, 1992 thru September 30, 1993: 0 (none)
(in place cubic yards)

C. OTHER INFORMATION TO BE SUBMITTED N/A - Per Doug Van Nattan on 9/18/9

Please attach the following required information. Please indicate attachment number/letter in the blank provided.

attachment

1. _____ Certification by Professional Engineer -
(Section 812.102)

SUMMARY OF CERRO'S ON-SITE INERT LANDFILL FACILITY

Between 1955 and 1969 Cerro purchased several parcels of land totaling approximately 17 acres, located to the east of its property. This land was used by Cerro from that time until March 1, 1991 as a landfill for inert material, generally concrete, metallics, brick, construction and demolition debris. Cerro also uses the land for the storage of its copper tube products in trailers, parking of empty trailers, storage of salvageable and usable old equipment, reclamation storage area for refractory brick prior to being reclaimed and waste dumpster storage. It is estimated that during the 37 years Cerro has owned at least a portion of the land, Cerro has placed between 1 to 8 feet of cover over the 17 acres depending on the slope of the land. This is approximately 27,500 yds to 220,000 yds of inert material which may have been landfilled during the 37 years.

Prior to Cerro's purchase of the land, the southern most portion of the land was used by the previous owner as a gravel pit/landfill area. This fact is documented in an Ecology & Environment, Inc report prepared for the Illinois Environmental Protection Agency, Division of Land Pollution Control dated May 1988. The report is titled "Expanded Site Investigation Dead Creek Project Sites at Cahokia/Sauget, Illinois Final Report." The area in question is noted as Site I of Area 1 in the report. Cerro does not have any way of determining the amount of material or the type of material the previous owners landfilled.

The current condition of the area is as follows:

1. Cerro discontinued the use of this area for inert material landfilling prior to March 1, 1991. We also do not plan to use this area in the future for disposal but only for storage as indicated above. Cerro has notified all relevant plant personnel that the area is to be used for storage only.
2. The area is fenced and the gates are controlled by Cerro's security force. There is no public access to the area. Additionally Cerro maintains perimeter cameras and continuous perimeter patrols by its full time Security Department.
3. The majority of the surface is tightly packed crushed stone. However, there are some small portions of the surface that have fill dirt and debris as its surface with some vegetation growth.
4. Surface drainage is either toward public roadways or toward a rainwater control ditch. Both drainages ultimately drain to the Village of Sauget Wastewater treatment system since the system is a combined sewer system.

